

EXHIBIT 85

Morgan Lewis

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April 19, 2021

VIA E-MAIL

George C. Aguilar
5040 Shoreham Place
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RE: *Forth et al. v. Walgreen Co.*, Case No. 17-cv-2246

Dear Counsel:

I write on behalf of Express Scripts, Inc. ("ESI") in response to the subpoena it received in connection with the above-referenced matter and our related correspondence.

Attached please find ESI's second production, bearing the bates number ESI-0001549. This document is a report containing transactional data for prescription drug purchases by beneficiaries of IUOE made at Walgreens Pharmacies before April 2009.

This document has been designated ATTORNEYS' EYES ONLY.

We have also attached a revised version of the proposed declaration, which you originally provided on February 23, 2021. We welcome your thoughts on how best to convey the additional information needed in relation to the claims data we have provided. Further, we are currently preparing the requested addendum, and will send along a draft for your review.

Please let me know if you would like to schedule a time to discuss this matter further.

Sincerely,

/s/ *Dani Elks*

Dani Elks

CC: Carey Alexander, Scott & Scott LLP
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